

**UNITED STATES DISTRICT COURT**  
for the  
**Eastern District of Michigan**

United States of America

v.

MARTELL GRESHAM

Case: 2:22-mj-30011

Judge: Unassigned,

Filed: 01-07-2022

SEALED MATTER (kcm)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 20, 2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in Possession of a Firearm

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.



Complainant's signature

\_\_\_\_\_  
Special Agent Matthew Kuiack, FBI

\_\_\_\_\_  
Printed name and title

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: January 7, 2022

City and state: Detroit, Michigan



Judge's signature

\_\_\_\_\_  
Hon. Jonathan J.C. Grey, U.S. Magistrate Judge

\_\_\_\_\_  
Printed name and title

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

v.

MARTELL GRESHAM,

Defendant.

Case No.

UNDER SEAL

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Matthew Kuiack, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am employed as a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since July 2019. I am currently assigned to the FBI Detroit Field Office and the Violent Gang Task Force (VGT), and my current duties include investigating gangs, firearms trafficking, and narcotics trafficking. Prior to my present assignment, I was a Sheriff's Deputy with the Mitchell County Sheriff's Office, Mitchell County, Kansas. During my time as a Sheriff's Deputy, I investigated multiple aspects of narcotics violations, including possession, trafficking, interdiction, controlled purchases, and work with confidential human sources. Throughout my career as a law enforcement officer and Special Agent, I have participated in investigations involving

narcotics and firearms, as well as numerous investigations that resulted in the execution of search and arrest warrants.

2. I submit this affidavit in support of a criminal complaint charging that, on or about Monday, December 20, 2021, within the Eastern District of Michigan, the defendant, Martell GRESHAM (D.O.B.: XX/XX/1985), knowing he had been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, in violation of Title 18, United States Code, Section 922(g)(1).

3. I make this affidavit from personal knowledge as well as information provided by other law enforcement officials and/or their reports and records. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all details or facts that exist pertaining to the investigation.

### **PROBABLE CAUSE**

4. On or about Monday, December 20, 2021, at approximately 12:45 p.m, Michigan State Police (MSP) Troopers were working a crash scene in the vicinity of Michigan Highway M-39 at Schoolcraft, Detroit, Michigan. MSP Trooper Indrit Molla was partially blocking the right lane while the left lane was blocked by the MSP Courtesy Patrol van (CP). Trooper Molla was advised by a tow truck driver responding to the scene that a black Jeep Grand Cherokee,

Michigan registration DSX4418, was driving on the shoulder bypassing all traffic that was stopped due to the crash. Upon getting closer to the scene, the Jeep merged back into traffic. Trooper Molla attempted to stop the Jeep and address the infraction. The driver of the Jeep, later identified as GRESHAM, fled past Trooper Molla, lost control, and crashed into the CP van. The Jeep then continued before crashing into a Ford Explorer and the right steel barrier, becoming disabled.

5. Trooper Molla witnessed the GRESHAM exit the Jeep and flee on foot east of M-39 and into backyard of nearby properties. After a short foot pursuit, Trooper Molla detained GRESHAM at Kendall Street and Longacre Street, Detroit, Michigan. GRESHAM was brought back to the accident scene where three witnesses identified him as the driver of the jeep.

6. MSP Trooper Alkhafaji conducted a search of GRESHAM. Inside GRESHAM's pocket was a black, Glock pistol magazine containing 15 rounds of .40 caliber ammunition. A search of the jeep yielded a black bullet proof vest with soft armor. MSP Trooper Sonstrom and his K9 located a pistol and magazine in the yard of 14144 Southfield Freeway, Detroit, Michigan, approximately 100 feet northeast of the Jeep, along the path of travel taken by GRESHAM as he fled the scene. The pistol was a Glock 22 pistol, .40 caliber, serial number PXC250, with an inserted, clear ETSGROUP.US magazine containing an unknown quantity of

ammunition. The recovered magazine and ammunition found in GRESHAM's pocket matched the Glock 22 located by Trooper Sonstrom.

7. Trooper Molla transported GRESHAM to MSP Metro South Post in Taylor, Michigan for fingerprinting and processing.

8. A query of the computerized criminal history (CCH) for GRESHAM revealed the following felony convictions:

- In or around 2001, MARTELL was convicted in Ohio, of one count of Felony Breaking and Entering to Commit Theft or Felony Trespass Unoccupied Structure by Force.
- In or around 2005, MARTELL was convicted in the 3rd Circuit Court, Wayne County, Michigan, of one count of Felony Attempted Motor Vehicle – Unlawful Driving Away.
- In or around 2006, MARTELL was convicted in the 3rd Circuit Court, Wayne County, Michigan, of one count of Felony Breaking and Entering a Vehicle with Damage to the Vehicle.
- In or around 2011, MARTELL was convicted in the 3rd Circuit Court, Wayne County, Michigan, of one count of Felony Motor Vehicle Operating a Chop Shop.

- In or around 2012, MARTELL was convicted in the 3rd Circuit Court, Wayne County, Michigan, of one count of Felony Motor Vehicle Unlawful Driving Away.
- In or around 2013, MARTELL was convicted in the 3rd Circuit Court, Wayne County, Michigan, of one count of Felony Police Officer Fleeing.
- In or around 2019, MARTELL was convicted in the 3rd Circuit Court, Wayne County, Michigan, of one count of Felony Weapons Firearm Possession by Felon, one Felony count of Weapons Ammunition Possession by Felon, two counts of Weapons Felony Firearm.

9. On or about January 6, 2021, ATF Special Agent and Interstate Nexus Expert Michael Jacobs reviewed the history of the Glock 22, .40 caliber, bearing serial number PXC250, and made a preliminary determination that the firearm was most likely manufactured outside the state of Michigan, and therefore this firearm has traveled in interstate commerce from its point of manufacture to Michigan.

### **CONCLUSION**

12. Based on the foregoing, I respectfully submit there is probable cause to believe that, on or about December 20, 2021, within the Eastern District of Michigan, Martell GRESHAM, knowing that he had been convicted of a crime

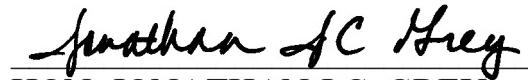
punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, said firearm having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).

Respectfully submitted,

By:

  
Matthew Kuiack  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me and/or by reliable electronic means this 7th day of January, 2022.

  
HON. JONATHAN J.C. GREY  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF MICHIGAN